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Attorney for Defendants Kim Ki Sung and KSK Corporation

IN THE DISTRICT COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

) CIVIL ACTION NO. 05-0019
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)
)
) DEFENDANTS' RULE 26
) DISCOVERY DISCLOSURES
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Comes now defendants Kim Ki Sung and KSK Corporation who submits the following pre-discovery disclosure:

1. PERSONS WITH DISCOVERABLE INFORMATION:

Persons with discoverable knowledge presently known to defendants include but are not limited to the following:

- A. Kim Ki Sung
- B. Kim Sung Eun
- C. Kim Hang Kwon

2. **DESCRIPTION AND LOCATION OF RELEVANT DOCUMENTS:**

The documents possessed by defendants relevant to its defenses in this lawsuit include the following:

- 1. Corporate Documents.
- Documents for the equipment transfer from Jung Jin Corp and Asia Enterprises to KSK. 2.
- 3. Federated States of Micronesia Loan Documents.
- 4. KSK Employee records.

3. **EXPERT WITNESSES:**

Defendants do not anticipate retaining any experts other than a translator.

COMPUTATION OF DAMAGES: 4.

Defendants dispute the existence of any damages

By: _____G. Anthony Long

Law Office of G. Anthony Long